REMARKS

Applicants have carefully considered the July 25, 2005 final Office Action regarding the above-identified application, and the claim amendments above together with these remarks are presented in a bona fide effort to respond thereto and address all issues raised in that Action. Applicant respectfully requests a prompt favorable reconsideration of this matter.

The Examiner objected to some minor informalities in claims 10 and 23. As suggested, "a" has been added to both of these claims, so the objections to those claim should be overcome.

Claims 14, 24 and 33 have been amended above to eliminate alleged indefiniteness from those claims and the claims that depend therefrom. The amendments to these dependent claims (14, 24 and 33) clarify that the translation definition defines correspondence relationships between real addresses and management addresses belonging to the address system that is different from the one defined by the NAT. As recited in claims 14, 24 and 33, this definition is that of "said another management protocol proxy." The respective independent claims recite a management protocol proxy and another management protocol proxy. It is respectfully submitted that the amended language of claims 14, 24 and 33 is clear, concise and definite. Hence, the indefiniteness rejection should be withdrawn with respect to claims 14-16, 24-26 and 33-35.

The amendments of various dependent claims above, to address minor formality objections and eliminate indefiniteness should not raise any issues of new matter and should not require any new search or consideration by the Examiner. Instead, these amendments should obviate several issues raised in the latest Action. Hence, entry of the amendments under Rule 116 is proper at this time.

The Office Action includes an objection to claim 30 (in paragraph number 3), for allegedly failing to further limit its parent claim. This objection is traversed. The dependent

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claim adds a further step, information translation, to the address translation, data generating and transmitting steps implemented by the program product of independent claim 28. It is noted that the Action did not include an objection to the similar method recited in dependent claim 21. Applicant requests that the Examiner withdraw the objection to claim 30.

The indefiniteness rejection also included claims 18 and 36. Essentially, this part of the rejection alleged that use of the term "virtual" in relation to an address (as opposed to a "management address") was not sufficiently clear to enable one skilled in the art to distinguish between two recited types of addresses. This rejection is traversed. The term "virtual" is commonly used in a wide range of telecommunication technology arts. In accord with the common usage in such arts, something that is characterized as "virtual" appears similar to but is not really the same as the real item. Hence, a "virtual address" is a pretend address, although it may appear like a real address, such as for example, the recited management address. For at least these reasons, it is believed that claims 18 and 36 would be clear, concise and definite when read by a person of ordinary skill in the art, and Applicant respectfully requests that the Examiner withdraw the indefiniteness rejection with regard to those claims.

The Examiner also rejected all of the pending claims (9-36) under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 6,581,108 to Denison et al. (hereinafter Denison). This rejection is respectfully traversed.

Applicant's representative wishes to thank Examiner Dohm Chankong for the courtesy extended in the personal interview conducted on November 22, 2005. The interview focused on the language of claim 19, as a representative example of the rejected claims. For illustration purposes (only), the language of that claim was read on the examples shown in application Figs. 8 and 3. The claim language was then compared to Denison, as applied in the art rejection in the

latest Action. Applicant's representative asserted that the independent claims, particularly claim 19, distinguished over Denison for reasons generally similar to those discussed in more detail below. No agreement was reached.

Claim 9 recites an address translation processing unit, an assembly/disassembly processing unit and a communication unit that transmits the management protocol proxy data. Method claim 19 recites steps that are substantially similar to the operations of the units recited in apparatus claim 9. Product claim 28 recites that the programming causes a programmable device to perform steps similar to those recited in method claim 19. In all of these three independent claims, the address translation processing translates a transmission source address, contained in a management protocol packet from a monitored apparatus on a network connected by a management protocol proxy. The source address is translated into a management address. The independent claims recite that this management address belongs to an address system that is different from an address system defined by the NAT. An example would be a virtual address or a management address as described in Applicant's specification and in some dependent claims. In all three of the independent claims, the assembly/disassembly processing generates management protocol proxy data. This data includes the management protocol packet (after the address translation). The protocol proxy data also includes two addresses, a transmission source address in which an address of the management protocol proxy is set, and a transmission destination address in which an address of another management protocol proxy is set. Fig. 3 is an example of a packet wherein the management protocol proxy data includes a source address, and the IP header includes an address of one proxy (source) and an address of another proxy (destination).

Item 7 of the Office Action alleges that Denison, column 3, lines 22-26 and lines 31-43, discloses the translation of a transmission source address into a management address which is not defined by NAT. However, this is not correct.

Denison discloses a NAT translation, and Denison teaches a payload translation by an additional element referred to as a Management Payload Address Translator or "MPAT." The MPAT 102 translates IP address related information contained in the payload of SNMP type management protocol packets "in order to retain consistency" (see e.g. column 2, lines 59-67). Hence, rather than a translation of an address into "a management address" that belongs "to an address system different from an address system defined by the NAT," as in Applicant's independent claims, Denison's MPAT 102 translates data in the SNMP packet payload into address data for an address system that has been defined by the NAT (in order to maintain the consistency of the management platform's view of the data).

The "Response to Argument" section of the Office Action appears to allege that, since address translation can be defined by NAT 104 and MPAT 102, respectively, an address translated by MPAT 102 is different from an address defined by NAT 104. Such an interpretation is contrary to the express teachings of Denison. If the MPAT translation is to provide consistency with the NAT translation, any translation by the MPAT would provide an address as defined by the NAT. If the NAT translates a local source address to a global address in the IP header, and a similar local source address was contained in the SNMP data (payload of the IP packet), it appears that Denison's MPAT would perform the same translation to the same global address so that the SNMP data would remain consistent with the IP header.

Typically, a NAT translator provides mapping between a global address visible from the Internet domain and one or more private network IP addresses. In Denison, an SNMP packet is

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transmitted from MPAT 102 to a terminal 112 via NAT 104. In such a case, like the NAT, the MPAT would translate any payload data regarding an address indicative of the terminal 112 between the global address and the local address of the particular terminal (using a correspondence table between local addresses and global addresses of the NAT), exactly the same as defined by NAT 104. If the global address is not so allocated by the mapping of the MPAT 102, each of the terminals 102 can not be monitored from the Internet outside the NAT, because the payload data of the SNMP packet(s) would be inconsistent with regard to the NAT mapping. Hence, Denison's <u>MPAT and NAT must implement the same address system of mapping</u>.

The comparison of Denison to the claims in the rejection also breaks down on another point. In a system such as that of Denison, there are two types of address information obtainable from a packet of a network management protocol, such as an SNMP packet. A first type of address information would be the source and/or destination address indicating which terminal or node the information was obtained from or sent to. This is the IP address information contained in the packet header and translated by the NAT and used for actual packet routing. The other type of address information is that used for network management and contained within the payload of a network management protocol packet. For example, address information contained in the IP header is shown in Fig. 2 of this application; whereas payload address information is contained in the PDU of the SNMP packet (see also Fig. 13 of this application).

In this regard, Denison's translation at the MPAT 102 is only translating the second type address related information, that is to say address related information found within the payload of the SNMP packet. The only other translation is that of the NAT itself. Hence, the MPAT that Denison adds to the network with the NAT translator does not provide protocol data processing

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that includes both the address translation processing for translating the transmission source address and the assembly/disassembly processing for generating actual management protocol proxy data, including both (1) a transmission source address of a proxy and (2) a transmission destination address of another proxy.
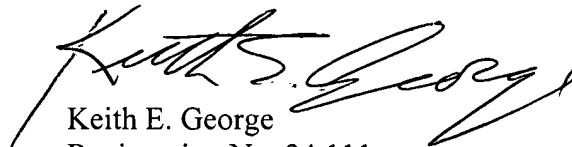
For at least the reasons outlined above, Denison does not satisfy the recitations of any of the independent claims. Hence, Denison does not anticipate any of the pending claims, and the anticipation rejection should be withdrawn.

It is believed that this response addresses all issues raised in the latest Action. However, if any further issue should arise that may be addressed in a further interview or an Examiner's amendment, it is requested that the Examiner telephone Applicant's representative at the number shown below.

To the extent necessary, if any, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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